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March 26, 2020

The Honorable Andrew L. Carter, Jr.  
U.S. District Court Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007  
VIA ECF

Re: *United States v. Dennis McDonald*, et. al, 19-cr-828 (ALC)

Dear Judge Carter,

I am CJA counsel to Dennis McDonald in the above-captioned matter. I write to inform the court that the prosecutors and the defense have agreed upon a bail package in this matter, pending the approval of Your Honor.

Mr. McDonald was originally ordered detained by Magistrate Judge Netburn following a bail hearing at the time of his arraignment on November 22, 2019. Notably, Judge Netburn explicitly ordered that the parties could petition the Court for a modification of the detention order should they identify an appropriate residential treatment program for Mr. McDonald.<sup>1</sup> Since that hearing, the prosecution and defense have had many discussions regarding placement or a bail package for Mr. McDonald, and we seem to have finally agreed upon the following conditions:

1. An unsecured bond in the amount of \$150,000.00.
2. Three co-signers on this bond, including Mr. McDonald's mother, his father, and his girlfriend's mother. All three of these proposed signatories are gainfully employed and they are prepared to be interviewed by the prosecutor's office.
3. Home detention without electronic monitoring at the home of Mr. McDonald's mother, with travel outside the home only permitted for attorney visits, court appearances, and medical appointments. Employment may also eventually be permitted.
4. Mr. McDonald shall submit to drug testing through Pretrial Services and shall not use or abuse controlled substances.
5. Mr. McDonald shall have no communication with any co-defendants, except in the presence of attorneys.

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<sup>1</sup> See Document # 18, filed November 22, 2019.



THE LAW OFFICE OF  
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6. Mr. McDonald shall surrender his travel documents and make no applications for any new passports, etc.
7. Mr. McDonald shall not commit any new federal or state crimes.
8. Mr. McDonald shall comply with all other conditions imposed by Pretrial Services.

These conditions will adequately protect the public from any potential threat posed by Mr. McDonald, as well as reasonably assure his return to court. 18 U.S.C. § 3142. We thus respectfully request that the Court modify the existing detention order to reflect the conditions described above.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_

Matthew Galluzzo

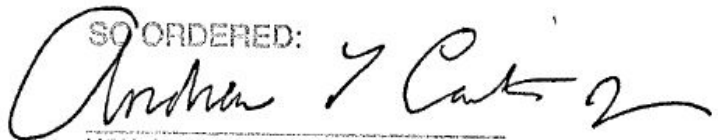
Counsel for Dennis McDonald

Cc:

AUSA Ryan B. Finkel

AUSA Mary Elizabeth Bracewell

Dated: March 31, 2020

SO ORDERED:  
  
\_\_\_\_\_  
HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE